IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	**No. 1:07-M-002M**
	:	
	:	
JAMES G. MANNING	:	

JOINT MOTION TO EXCLUDE CERTAIN TIME
UNDER THE SPEEDY TRIAL ACT

The United States, by and through its attorneys, Robert Clark Corrente, United States Attorney, and Peter F. Neronha, Assistant United States Attorney, and defendant James G. Manning, by and through his attorney, Kevin J. Fitzgerald, Esq., move the Court to exclude the period January 17, 2007 through February 22, 2007 from the thirty day period within which an information or an indictment must be filed against the defendant pursuant to 18 U.S.C. § 3161(b). As grounds for this joint motion, the government and the defendant state as follows:

1. The government and the defendant are currently engaged in plea negotiations, which may lead to the prompt resolution of the charges filed by complaint in this matter, thereby conserving judicial resources.

2. Counsel for the defendant has only recently entered his appearance, and counsel and the defendant therefore need additional time to discuss and consider a proposed plea

agreement. Accordingly, the ends of justice will be served by excluding the afore-mentioned time period, and such ends of justice outweigh the interest of the defendant and the public in a speedy indictment and/or trial. A proposed Order will be submitted to the Court.

Respectfully submitted,

JAMES G. MANNING,

By his Attorney,

/s/ Kevin J. Fitzgerald

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UNITED STATES OF AMERICA,

By its Attorneys,

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/s/ Peter F. Neronha

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